REMARKS

By this amendment, claims 1-33 are pending, in claims 1, 8, 15, 22, and 27 are currently amended, and claims 32 and 33 are newly added. No new matter is introduced.

The Office Action mailed February 10, 2006 rejected claims 1-31 under 35 U.S.C. § 102 as anticipated by *Godfrey et al.* (US Pub. No. 2005/0071079).

To advance prosecution, Applicants have amended independent claims 1, 8, 15, 22 and 27.

Amended claims 1 and 15 recite "transmitting **a configuration message** over the wireless network to one of the telemetry devices for **configuring a programmable input/output (I/O) port** of the one telemetry device." Claim 8, as amended, recites "a presentation server configured to generate **a configuration message** for transmission over the wireless network to one of the telemetry devices for **configuring a programmable input/output (I/O) port** of the one telemetry device."

In support of the rejection of claims 1, 8 and 15, the Office Action refers to paragraphs [0019] and [0020] of *Godfrey et al.* for the claimed configuration message. Applicants have further defined that the I/O ports are programmable, thereby providing additional context for the term "configuration message." Paragraphs [0019] and [0020] state the following:

> [0019] The communications station, in other embodiments, also accepts **control messages and uses those messages to control the vehicle**. For example, the service provider can transmit control messages to the communications station **to stop or affect operation of the vehicle's engine, honk the horn, turn the headlights on, or activate on-board audio or video for monitoring purposes**. Controlling the vehicle in this way can help track the vehicle and, if needed, to help recover the vehicle.
>
> [0020] An illustrative embodiment of the present invention comprises: (a)

> receiving a unique vehicle identifier and a location from a wireless communications station, wherein the wireless communications station transmits the unique vehicle identifier and the location via a shared-communications channel of a Dedicated Short Range Communications infrastructure; and (b) notifying a user of the location when the unique vehicle identifier belongs to a non-empty set of vehicle identifiers.

From the above passages, the control messages of *Godfrey et al.* cannot reasonable be construed as the claimed configuration message "for **configuring a programmable input/output (I/O) port** of the one telemetry device." In fact, claim 2 recites "transmitting a **control message** to the one telemetry device, in response to the control message the one telemetry device controlling one of the object via the I/O port and status of the I/O port." Thus, under the doctrine of claim differentiation, the configuration message (e.g., of claim 1) cannot be the control message (e.g., of claim 2). Moreover, *Godfrey et al.* provides no disclosure of "programmable" ports. That is, the control interface 406 (FIG. 4) is not programmable in the sense of the claimed invention.

Amended claims 22 and 27 recite "wherein the fleet and asset management generates a configuration message based on the user input for transmission over the **wireless network, including a two-way paging system**, to the one telemetry device for configuring an input/output (I/O) port of the one telemetry device **according to a protocol adapted for the two-way paging system.**"

For a supposed teaching of the claimed two-way paging system, the Office Action (on page 3) refers to paragraphs [0034]-[0037] of *Godfrey et al.* However, Applicants careful study of the reference and the cited passages reveals no such disclosure. The cited passages state the following (*Emphasis Added*):

> [0034] Communications station 202 (or "station 202") wirelessly transmits signals to and receives signals from access point 203 in well-known fashion. Station 202 is situated in vehicle 101, in accordance with the illustrative embodiment of the

present invention. As will be appreciated by those skilled in the art, in some embodiments station 202 operates in accordance with a protocol that is based on a **local area network protocol (e.g., IEEE 802.11a, etc.)**, while in other embodiments station 202 operates in accordance with a protocol that is based on **a metropolitan-area network protocol (e.g., IEEE 802.16 ["Wi-Max"], etc.)**. It will be clear to those skilled in the art, after reading this disclosure, how to make and use station 202.

[0035] Although a single communications station is depicted in FIG. 2, it will be clear to those skilled in the art, after reading this disclosure, how to make and use telecommunications system 200 to handle multiple communications stations simultaneously.

[0036] It will also be clear to those skilled in the art, after reading this disclosure, how to make and use telecommunications system 200 with more than one access point that is connected to and communicate with server 204, or to a collection of servers that provide the functionality described in this disclosure for server 204.

[0037] Access point 203 wirelessly transmits signals to and receives signals from station 202, and possibly other communications stations by using Dedicated Short Range Communications infrastructure, in well-known fashion. As will be appreciated by those skilled in the art, in some embodiments access point 203 operates in accordance with a protocol that is based on a local area network protocol (e.g., IEEE 802.11a, etc.), while in other embodiments access point 203 operates in accordance with a protocol that is based on a metropolitan-area network protocol (e.g., IEEE 802.16 ["Wi-Max"], etc.). It will be clear to those skilled in the art, after reading this disclosure, how to make and use access point 203.

As evident from the above passages, at best, the reference mentions the use of a wireless network, namely IEEE 802.11a and IEEE 802.16 networks. This, however, is not a two-way paging system. Although the patent laws provide that the claims are given their broadest reasonable interpretation, this doctrine does not permit a broad reading of the reference. Nothing within these cited passages (nor the entire reference) mentions a paging system, much less in the manner claimed.

Therefore, as anticipation under 35 U.S.C. § 102 requires that each and every element of the claim be disclosed in a prior art reference, based on the foregoing, it is clear that *Godfrey et al.* fails to anticipate independent claims 1, 8, 15, 22 and 27.

Additionally, claims 2-7, 9-14, 16-21, 23-26 and 28-31, which depend correspondingly from the amended independents claims, should be allowable at least for the reasons put forth for the allowability of these independent claims.

Turning now to newly added claims 32 and 33, these dependent claims recite "wherein the protocol specifies a format for the configuration message including, a field for providing port settings including, a port field specifying the I/O port, and a pin setting field for specifying pin settings for the I/O port, wherein the pin setting field specifies information on type of pin and information on configuration of the pin." Claims 32 and 33 depend from amended claims 1 and 8, respectively, and thus, should be allowable. Moreover, *Godfrey et al.* fails to teach these features.

Therefore, the present application, as amended, overcomes the rejection of record and is in condition for allowance. Favorable consideration is respectfully requested. If any unresolved issues remain, it is respectfully requested that the Examiner telephone the undersigned attorney at (703) 425-8508 so that such issues may be resolved as expeditiously as possible.

Respectfully Submitted,

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Date

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